

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

THE STATE OF TEXAS,

Defendant.

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Case No. 1:21-cv-00796-RP

**DEFENDANT’S UNOPPOSED MOTION
FOR LEAVE TO EXCEED PAGE LIMITS**

Defendant the State of Texas respectfully requests an extension of the page limit set by Local Rule CV-7(c)(3) for a filing a dispositive motion. Texas seeks permission to file a motion to dismiss that does not exceed thirty pages. In support of this motion, Texas states the following:

1. On September 15, 2021, the Court granted leave for the United States to file its emergency motion for a temporary restraining order or preliminary injunction on September 15, 2021. ECF 7. The 35-page motion is accompanied by 15 supporting declarations. ECF 8.

2. The parties have engaged in expedited discovery during the last week, including document production and 5 witness depositions.

3. As the Court has recognized, “this case presents complex, important questions of law that merit a full opportunity for the parties to present their positions to the Court.” ECF 19.

4. Defendant files this motion in the interest of justice. Due to the nature and complexity of this case and the volume of information produced, additional pages are necessary to fully brief the issues raised in Plaintiff’s motion, and presented by its complaint.

5. The undersigned conferred with Plaintiff’s counsel by email, who represented that Plaintiff did not oppose a page extension that doesn’t exceed thirty pages.

Based on the foregoing, Texas respectfully requests that its unopposed motion for leave to file a response in excess of the page limits be granted.

Date: September 29, 2021

Respectfully submitted.

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Attorney General of Texas

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COUNSEL FOR DEFENDANT

CERTIFICATE OF CONFERENCE

I certify that, on September 28, 2021, I conferred with Plaintiff's counsel, who represented that Plaintiff did not oppose the relief sought.

/s/ William T. Thompson
WILLIAM T. THOMPSON

CERTIFICATE OF SERVICE

I certify that on September 29, 2021, a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) and served on all counsel of record.

/s/ William T. Thompson
WILLIAM T. THOMPSON